

August 16, 2022

Hon. Frederick Block, Senior Judge United States District Court Eastern District of New York 225 Cadman Plaza East, 1214 South Brooklyn, New York 11201

By Electronic Filing.

Re: Velez v. Prusayev, 22-CV-1810 (FB) (VMS)

Dear Judge Block:

I am co-counsel for Plaintiffs in the above-captioned matter. I write, per the Court's Motion Rule 1(D), to request an extension of 60 days to the ordinary time available under Rule 54(d) to apply for costs (inclusive of attorneys' fees under 42 U.S.C. § 1988), consistent with the judgment entered in this case. *See* ECF No. 28. Under Rule 54, the current deadline is August 26<sup>th</sup>, 2022. This time will allow the parties to see if fees can be resolved without litigation. Defendants consent, and no prior application has been made for this time.

If this motion is granted, the new deadline will be Tuesday, October 25, 2022.

As always, I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

J. Remy Green
Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

Attorneys for Plaintiffs 1639 Centre St., Suite 216 Ridgewood, New York 11385

cc:

All relevant parties by ECF.